

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 07-67</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: February 22, 2007</b>
<b>NASSAR R. RAHMAAN,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Rodney Burns,"</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
<b>a/k/a "B,"</b>	<b>:</b>	<b>18 U.S.C. § 1028A(a) (aggravated identity</b>
<b>ANDRE T. CEPHAS,</b>	<b>:</b>	<b>theft - 5 counts)</b>
<b>a/k/a "Husayn,"</b>	<b>:</b>	<b>18 U.S.C. § 1542 (making false statement</b>
<b>SCOTTIE J. WILLIAMS</b>	<b>:</b>	<b>in United States passport application -</b>
<b>JOSETTE J.M. WILSON</b>	<b>:</b>	<b>5 counts)</b>
<b>JUAN G. RUTLEDGE,</b>	<b>:</b>	<b>18 U.S.C. § 1028(a)(1), (f) (attempt to</b>
<b>a/k/a "Bucky"</b>	<b>:</b>	<b>produce an identification document</b>
	<b>:</b>	<b>without lawful authority - 1 count)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

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**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least in or about June 2005 and continuing through at least in or about late-January 2007, in the Eastern District of Pennsylvania and elsewhere, defendants

**NASSAR R. RAHMAAN,  
a/k/a "Rodney Burns,"  
a/k/a "B,"  
ANDRE T. CEPHAS,  
a/k/a "Husayn,"  
SCOTTIE J. WILLIAMS,  
JOSETTE J.M. WILSON,  
and  
JUAN G. RUTLEDGE,  
a/k/a "Bucky,"**

conspired and agreed with each other, and others known and unknown to the grand jury to: (a)  
wilfully and knowingly make false statements in applications for United States passports, with

intent to induce and secure for the use of themselves and others, the issuance of passports under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws; and (b) knowingly transfer, possess, and use without lawful authority the means of identification of another person during the commission of a felony offense, that is, making false statements in applications for United States passports, in violation of Title 18, United States Code, Sections 1028A(a) and 1542.

### **MANNER AND MEANS**

2. It was part of the conspiracy that defendant NASSAR R. RABIH was in the business of, among other things, obtaining fraudulent United States passports using the identifying information of people he recruited in the Philadelphia area and the photographs of others.

It was further part of the conspiracy that:

3. Defendant NASSAR R. RAHMAAN recruited others to apply for United States passports with their identifying information but using the photographs of other people.

4. Defendant NASSAR R. RAHMAAN agreed to pay the people he recruited to make passport applications approximately \$1,000 to \$1,500 per fraudulent United States passport they obtained.

5. Defendant NASSAR R. RAHMAAN recruited defendant ANDRE T. CEPHAS to obtain fraudulent United States passports containing the photographs of others which defendant RAHMAAN intended to sell. Defendant RAHMAAN agreed to pay defendant CEPHAS between \$1,000 and \$1,500 per fraudulent United States passport he was responsible for obtaining.

6. At the direction of defendant NASSAR R. RAHMAAN, defendant ANDRE T. CEPHAS recruited defendants SCOTTIE J. WILLIAMS, JOSETTE J.M. WILSON, and JUAN G. RUTLEDGE, a/k/a “Bucky,” to obtain fraudulent United States passports with the photographs of others for defendant RAHMAAN which defendant RAHMAAN intended to sell. Defendant RAHMAAN agreed to pay defendants WILLIAMS, WILSON, and RUTLEDGE between \$1,000 and \$1,500 for each fraudulent United States passport they were able to obtain.

### **OVERT ACTS**

\_\_\_\_\_ In furtherance of the conspiracy, defendants NASSAR R. RAHMAAN, ANDRE T. CEPHAS, SCOTTIE J. WILLIAMS, JOSETTE J.M. WILSON, and JUAN G. RUTLEDGE, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

\_\_\_\_\_ 1. On or about June 20, 2005, at the direction of defendant NASSAR R. RAHMAAN, defendant ANDRE T. CEPHAS applied for and obtained a fraudulent United States passport using his identifying information and another person’s photograph.

2. On or about January 9, 2006, at the direction of defendant NASSAR R. RAHMAAN, defendant JOSETTE J.M. WILSON applied for and obtained a fraudulent United States passport using her identifying information and another person’s photograph.

3. On or about February 24, 2006, at the direction of defendant NASSAR R. RAHMAAN, defendant ANDRE T. CEPHAS applied for and obtained a fraudulent United States passport using his identifying information and another person’s photograph, claiming that his first passport had been lost.

4. On or about May 23, 2006, at the direction of defendant NASSAR R.

RAHMAAN, defendant ANDRE T. CEPHAS recruited defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to obtain fraudulent United States passports for defendant RAHMAAN using the identifying information of defendants WILLIAMS and RUTLEDGE and the photographs of other people.

5. On or about May 23, 2006, defendant NASSAR R. RAHMAAN offered defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE approximately \$1,000 in cash for each fraudulent United States passport they were able to obtain.

6. On or about May 23, 2006, defendant NASSAR R. RAHMAAN possessed several passport-size photographs of individuals which he intended to supply to defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to use to obtain fraudulent United States passports.

7. On or about May 23, 2006, defendant NASSAR R. RAHMAAN selected passport-size photographs of individuals from the ones he possessed and provided one each to defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE for them to use in obtaining fraudulent United States passports.

8. On or about May 23, 2006, defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE applied for fraudulent United States passports, using their own identifying information and the photographs of other people that they had been given by defendant NASSAR R. RAHMAAN.

9. Between on or about May 23, 2006 and in or about November 2006, defendant NASSAR R. RAHMAAN contacted defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to check on the status of their obtaining the fraudulent passports.

10. In or about early-December 2006, defendant NASSAR R. RAHMAAN enlisted defendant SCOTTIE J. WILLIAMS to assist him in finding defendant ANDRE T. CEPHAS.

11. On or about December 8, 2006, defendant NASSAR R. RAHMAAN made arrangements to meet defendant SCOTTIE J. WILLIAMS on approximately December 12, 2006 to obtain the fraudulent United States passport that defendant WILLIAMS had attempted to obtain on May 23, 2006.

12. On or about January 17, 2007, defendant NASSAR R. RAHMAAN possessed two passport-sized photographs of a person in an effort to recruit a person that looked like the person in the photographs so that a United States passport could be obtained fraudulently using the photographs and the identifying information of someone else.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 20, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
and  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted  
the transfer, possession, and use, of a means of identification of another person, that is, a  
photograph of another person, during and in relation to a fraudulent application for a United  
States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and

2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”  
and  
JOSETTE J.M. WILSON**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted the transfer, possession, and use, of a means of identification of another person, that is, a photograph of another person, during and in relation to a fraudulent application for a United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and  
2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 24, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
and  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted the transfer, possession, and use, of a means of identification of another person, that is, a photograph of another person, during and in relation to a fraudulent application for a United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and

2.



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2006, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a Husayn,”  
and  
SCOTTIE J. WILLIAMS**

knowingly and without lawful authority transferred, possessed, and used a means of  
identification of another person, and aided and abetted the transfer, possession, and use, of a  
means of identification of another person, that is, a photograph of another person, during and in  
relation to a felony, that is obtaining a fraudulent United States passport, in violation of Title 18,  
United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and  
2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2006, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”  
and  
JUAN G. RUTLEDGE,  
a/k/a “Bucky,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted  
the transfer, possession, and use, of a means of identification of another person, that is, a  
photograph of another person, during and in relation to a felony, that is obtaining a fraudulent  
United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and

2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 20, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
and  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAHMAAN and CEPHAS provided with CEPHAS’s application a photograph of another person, not defendant CEPHAS, and falsely represented that he was the person in the photograph, when, in fact, defendants RAHMAAN and CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”  
and  
JOSETTE J.M. WILSON**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of themselves and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAHMAAN and WILSON provided with WILSON’s application a photograph of another person, not defendant WILSON, and falsely represented that she was the person in the photograph, when, in fact, defendants WILSON, RAHMAAN, and CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 26, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
and  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAHMAAN and CEPHAS provided with his application a photograph of another person, not defendant CEPHAS, and falsely represented that he was the person in the photograph, when, in fact, defendants RAHMAAN and CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2006, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”  
and  
SCOTTIE J. WILLIAMS**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAHMAAN and WILLIAMS provided with WILLIAMS’s application a photograph of another person, not defendant WILLIAMS, and falsely represented that he was the person in the photograph, when, in fact, defendants RAHMAAN, CEPHAS, and WILLIAMS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”  
ANDRE T. CEPHAS,  
a/k/a “Husayn,”  
and  
JUAN G. RUTLEDGE,  
a/k/a “Bucky,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of themselves and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAHMAAN and RUTLEDGE provided with RUTLEDGE’s application, a photograph of another person, not defendant RUTLEDGE, and falsely represented that he was the person in the photograph, when, in fact, defendants RAHMAAN, CEPHAS, and RUTLEDGE knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 17, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”**

knowingly and without lawful authority attempted to produce an identification document, that is, a United States passport, by providing two photographs of an individual to Andre T. Cephas, charged elsewhere, and directed Cephas to recruit a person to apply for a United States passport and falsely claim in the application that the person in the photographs was the person Cephas had recruited to apply for the United States passport.

In violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(i), (c)(1), and (f), and 2.



## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1028 and 1542, set forth in Counts Six through Twelve of this Indictment, defendant

**NASSAR R. RAHMAAN,  
a/k/a “Rodney Burns,”  
a/k/a “B,”**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses or that was used or intended to be used to facilitate the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982.

\_\_\_\_\_  
**A TRUE BILL:**

\_\_\_\_\_  
\_\_\_\_\_  
**GRAND JURY FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**